

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**\$179,192 IN UNITED STATES  
CURRENCY,**

**Defendants.**

**Case No. 22-06131-CV**

**JOINT MOTION TO EXTEND TIME TO  
INITIATE JUDICIAL FORFEITURE**

The United States, by the United States Attorney for the Western District of Missouri, and Michael Syakhasone (“the Claimant”), represented by counsel Joshua Adams, (collectively, “the Parties”), as authorized by 18 U.S.C. § 983(a)(3)(A), move the Court to extend the time in which the United States is required to initiate criminal and civil judicial forfeiture from December 12, 2022, to March 13, 2023, regarding property to which claims have been filed by the Claimant in a nonjudicial administrative forfeiture proceeding with the United States Department of Homeland Security, Customs and Border Protection (“CBP”). The property is described as follows:

**\$179,192 in United States Currency**

On July 26, 2022, CBP agents seized \$179,192 from luggage belonging to Claimant. CBP timely distributed written notice of intent to forfeit the property, as required by 18 U.S.C. § 983(a)(1)(A). On September 13, 2022, Claimant timely filed a claim to the property with CBP. The period for any other person to file a claim to the property under 18 U.S.C. § 983(a)(2)(A)-(E) has now expired. Pursuant to 19 U.S.C. §§ 1608 and 1610, upon the filing of the claim by Claimant,

CBP transmitted the claim to the United States Attorney for the purpose of initiating a judicial forfeiture action against the property. The 90-day deadline for the government to file a complaint for forfeiture against the property is December 12, 2022. As provided in 18 U.S.C. § 983(a)(3)(A), the 90-day period for filing the complaint may be extended by the Court “for good cause shown or upon agreement of the parties.”

The Parties have agreed to extend the time for filing the complaint in order to provide sufficient opportunity to evaluate their respective interests in and positions regarding the property. Therefore, the Parties respectfully request that the Court enter an order extending the deadline by which the United States shall be required to initiate judicial forfeiture shall be extended from December 12, 2022, up to and including **March 13, 2023**.

Respectfully submitted,

Teresa A. Moore  
United States Attorney

Dated: 12/6/2022

/s/ John Constance  
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Dated: 12/6/2022

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